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CITY ATTORNEY
2012 JUL -2 PM 3:37

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11 Attorneys for Plaintiff
12 WILLIAM TAYLOR

UNLIMITED JURISDICTION

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

11 WILLIAM TAYLOR,

12 Plaintiff,

13 vs.

14 CITY OF BURBANK, ET AL.,

15 Defendants.

CASE NO. BC422252

[Assigned to the Hon. John L. Segal,
Judge, Dept. "50"]

DECLARATION OF CHRISTOPHER
BRIZZOLARA IN SUPPORT OF REPLY
RE: MOTION FOR EXPERT FEES

Date: July 9, 2012
Time: 8:30 a.m.
Dept.: 50

19 I, Christopher Brizzolara, do declare as follows:

20 1. I am one of the counsel of record and one of the trial counsel for the plaintiff in the above-
21 captioned matter. I base this declaration on my personal knowledge. I am over 18 years of age,
22 and if called to testify regarding the contents of this declaration, I could and would competently
23 testify thereto. I submit this declaration in support of the reply in support of plaintiff's motion for
24 attorneys fees.

25 2. Submitted herewith as Ex. "A" is a true and correct copy of the bill we have received from
26 Sean Leoni, M.D. for providing his expert testimony at the trial of this matter. In accordance with
27 our custom and practice and as required by C.C.P. Section 2034, my co-counsel and/or myself
28

DECLARATION OF CHRISTOPHER BRIZZOLARA IN SUPPORT OF REPLY RE:
MOTION FOR EXPERT FEES

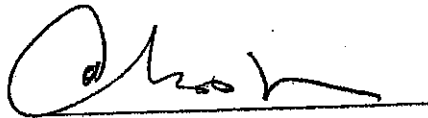
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1 will pay Dr. Leoni's bill for his trial testimony.

2 3. Over the last 24 years I have been involved with and/or have handled numerous trials in
3 the Southern California area in which internists and other treating physicians have been called as
4 both retained and non-retained expert witnesses. From 1988 to approximately 2003, I handled
5 well in excess of 100 medical malpractice actions, both as a defense attorney and as a plaintiff's
6 attorney. I am therefore familiar with the usual and customary rates charged by physicians of
7 comparable background, training, and skill as Dr. Leoni for testifying at trial. The amount charged
8 by Dr. Leoni for his fees for preparing for, traveling to and from, and testifying at the trial of this
9 matter are reasonable and consistent with the fees charged by physicians in the Southern
10 California area of comparable background, training, and experience for providing trial testimony.

11 I declare the foregoing to be true and correct under penalty of perjury under the laws of the
12 State of California.

13 Executed this 28th day of June, 2012,
14 in Santa Monica, California.



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16 Christopher Brizzolara
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EXHIBIT "A"

SEAN LEONI, MD
16661 VENTURA BOULEVARD, SUITE 604
TEL(818)788-8213 FAX (818)7888343

FACSIMILE TRANSMITTAL SHEET

TO:

FROM:

SELMA

GRACE

COMPANY:

DATE:

06/28/2012

FAX

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RE:

YOUR REFERENCE NUMBER:

WILLIAM TAYLOR

☒ URGENT

☐ FOR REVIEW

☒ PLEASE COMMENT

☐ PLEASE REPLY

☐ PLEASE RECYCLE

NOTES/COMMENTS:

THE FEE FOR DR. LEONI'S TRIAL TESTIMONY IS \$3000.00

PLEASE SEND THE PAYMENT TO : 16661 VENTURA BLVD., STE 604
ENCINO, CA 91436

THANK YOU FOR YOUR PROMPT ATTENTION TO THIS MATTER
SINCERELY,

GRACE MORADIANS
SEAN LEONI, MD

PROOF OF SERVICE

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES)

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years of age, and am not a party to the within action; my business address is 9100 Wilshire Boulevard, Suite 345E, Beverly Hills, California 90212.

On the date hereinbelow specified, I served the foregoing document, described as set forth below on the interested parties in this action by placing true copies thereof enclosed in sealed envelopes, at Beverly Hills, addressed as follows:

DATE OF SERVICE : June 29, 2012

DOCUMENT SERVED : **DECLARATION OF CHRISTOPHER BRIZZOLARA IN SUPPORT OF REPLY RE: MOTION FOR EXPERT FEES**

PARTIES SERVED : **SEE ATTACHED SERVICE LIST.**

XXX (BY FEDERAL EXPRESS) I caused the aforesaid document(s) to be delivered to Federal Express either by an authorized courier of Federal Express or by delivery to an authorized Federal Express office in a pre-paid envelope for overnight delivery to the addressee(s) as shown on the Service List.

XXX (BY ELECTRONIC MAIL) I caused such document to be electronically mailed to **Christopher Brizzolara, Esq.** at the following e-mail address: samorai@adelphia.net.

XXX (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

— (FEDERAL) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

EXECUTED at Beverly Hills, California on June 29, 2012.

Selma I. Francia

SERVICE LIST

WILLIAM TAYLOR v. CITY OF BURBANK
LOS ANGELES COUNTY SUPERIOR COURT CASE NO. BC 422 252

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